

JEREMIAH ROSS, Bar No. 105980
ross@rosslawllc.com
ROSS LAW LLC
50 SW Pine Street, Suite 402
Portland, OR 97204
Telephone: 503.224.1658
Facsimile: 888.499.2575

Attorney for Plaintiff

JEREMY D. SACKS, Bar No. 994262
jeremy.sacks@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
Telephone: 503.224.3380
Facsimile: 503.220.2480

*Attorneys for Defendants Red Rock Canyon
School, L.L.C. and Red Rock Canyon School Non-Profit
Organization*

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

A.S., a pseudonym,

Plaintiff,

v.

STATE OF OREGON, by and through its
Department of Human Services; RED ROCK
CANYON SCHOOL, L.L.C., a limited
liability company; RED ROCK CANYON
SCHOOL NON-PROFIT ORGANIZATION, a
foreign nonprofit; SEQUEL TSI HOLDINGS,
LLC, a foreign limited liability company;
SEQUEL YOUTH AND FAMILY
SERVICES, LLC, a foreign limited liability
company; VIVANT BEHAVIORAL

Case No.: 3:23-cv-01643-MO

STIPULATION (1) WITHDRAWING RED
ROCK ENTITIES' RULE 12(B)(5)
MOTION TO DISMISS FOR
INSUFFICIENT SERVICE OF PROCESS;
AND (2) REQUESTING ORDER
GRANTING RED ROCK ENTITIES'
RULE 12(B)(2) MOTION TO DISMISS
FOR LACK OF PERSONAL
JURISDICTION

Page 1 – STIPULATION (1) WITHDRAWING RED ROCK ENTITIES' RULE 12(B)(5)
MOTION TO DISMISS FOR INSUFFICIENT SERVICE OF PROCESS; AND (2)
REQUESTING ORDER GRANTING RED ROCK ENTITIES' RULE 12(B)(2)
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

HEALTHCARE, LLC, a foreign limited liability company; SEQUEL YOUTH SERVICES OF RED ROCK CANYON, LLC, a foreign limited liability company; MARILYN JONES, in her individual and official capacity; JANA McLELLAN, in her individual and official capacity; GLENDA MARSHALL, in her individual and professional capacity; RYAN SANTI, in his individual and official capacity; GENA PALM, in her individual and professional capacity; and JOHN STUPAK, in his individual and official capacity; and CARE YOUTH CORPORATION, a foreign corporation,

Defendants.

Counsel for plaintiff and counsel for defendants Red Rock Canyon School, L.L.C. and Red Rock Canyon School Non-Profit Organization (hereinafter jointly referred to as the “Red Rock Entities”) stipulate as follows:

1. The Red Rock Entities withdraw their Rule 12(b)(5) Motion to Dismiss for Insufficient Service of Process. (ECF 52)
2. Plaintiff and the Red Rock Entities stipulate that the law and facts are sufficient for the Court to grant the relief set forth in the Red Rock Entities’ Rule 12(b)(2) Motion for Lack of Personal Jurisdiction (ECF 53), and request that the Court enter an order granting that motion and dismissing Plaintiffs’ Amended Complaint against the Red Rock Entities for the reasons set for in the Red Rock Entities’ Rule 12(b)(2) Motion to Dismiss.

3. All parties shall bear their own attorneys' fees and costs associated with the motions set forth above.

DATED: June 25, 2024.

ROSS LAW LLC

STOEL RIVES LLP

/s/ Jeremiah Ross

JEREMIAH ROSS, Bar No. 105980
ross@rosslawllc.com

Attorney for Plaintiff

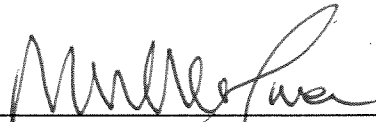
/s/ Jeremy D. Sacks

JEREMY D. SACKS, Bar No. 994262
jeremy.sacks@stoel.com

*Attorneys for Defendants Red Rock Canyon
School, L.L.C. and Red Rock Canyon School
Non-Profit Organization*

IT IS SO ORDERED.

DATED: 2 July 2024.



THE HONORABLE MICHAEL W. MOSMAN
U.S. DISTRICT COURT JUDGE